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WILLIAM T. WALSH  
CLERK

Richard T. DiBenedetto, Jr.  
384 Greenwich Street  
Bergenfield, NJ 07621  
(201) 385-8214  
Defendant Pro Se

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

WALSH SECURITIES, INC.,

Plaintiff

Vs.

CRISTO PROPERTY MANAGEMENT,  
COASTAL TITLE AGENCY,  
RICHARD DIBENEDETTO,  
ET ALS.

Defendants

Civil Action No. CV 97-3496

Hon. William G. Bassler

Answer to Cross-Claim

ANSWER TO CROSS CLAIM  
COUNT ONE

Defendant, Richard DiBenedetto, answers the Cross-claim of National Home Funding and Robert Skowrenski, II, as follows:

1. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
2. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
3. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
4. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
5. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
6. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II.

ANSWER TO CROSS CLAIM  
COUNT TWO

1. Defendant, Richard DiBenedetto, repeats answers contained in Count One at length herein.
2. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
3. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
4. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II.

ANSWER TO CROSS CLAIM  
COUNT THREE

1. Defendant, Richard DiBenedetto, repeats answers contained in Counts One and Two at length herein.
2. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
3. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
4. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II.

ANSWER TO CROSS CLAIM  
COUNT FOUR

1. Defendant, Richard DiBenedetto, repeats answers contained in Counts One, Two and Three at length herein.
2. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
3. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II.

ANSWER TO CROSS CLAIM  
COUNT FIVE

1. Defendant, Richard DiBenedetto, repeats answers contained in Counts One, Two, Three and Four at length herein.
2. Admitted.
3. Denied.

4. Denied.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II.

ANSWER TO CROSS CLAIM  
COUNT SIX

1. Defendant, Richard DiBenedetto, repeats answers contained in Counts One, Two, Three, Four and Five at length herein.

2. Denied.

3. Denied.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II.

ANSWER TO CROSS CLAIM  
COUNT SEVEN

1. Defendant, Richard DiBenedetto, repeats answers contained in Counts One through Six at length herein.

2. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

3. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

4. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II.

ANSWER TO CROSS CLAIM  
COUNT EIGHT

1. Defendant, Richard DiBenedetto, repeats answers contained in Counts One through Seven at length herein.
2. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
3. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II.

ANSWER TO CROSS CLAIM  
COUNT NINE

1. Defendant, Richard DiBenedetto, repeats answers contained in Counts One through Eight at length herein.
2. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
3. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
4. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II.

ANSWER TO CROSS CLAIM  
COUNT TEN

1. Defendant, Richard DiBenedetto, repeats answers contained in Counts One through Nine at length herein.
2. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
3. Neither admitted nor denied, but leaves the cross-claimant to its proofs

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II.

ANSWER TO CROSS CLAIM  
COUNT ELEVEN

1. Defendant, Richard DiBenedetto, repeats answers contained in Counts One through Ten at length herein
2. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
3. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

4. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II.

ANSWER TO CROSS CLAIM  
COUNT TWELVE

1. Defendant, Richard DiBenedetto, repeats answers contained in Counts One through Eleven at length herein.
2. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
3. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II.

ANSWER TO CROSS CLAIM  
COUNT THIRTEEN

1. Defendant, Richard DiBenedetto, repeats answers contained in Counts One through Twelve at length herein.
2. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
3. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

4. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
5. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II.

ANSWER TO CROSS CLAIM  
COUNT FOURTEEN

1. Defendant, Richard DiBenedetto, repeats answers contained in Counts One through Thirteen at length herein.
2. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
3. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
4. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
5. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II



ANSWER TO CROSS CLAIM  
COUNT FIFTEEN

1. Defendant, Richard DiBenedetto, repeats answers contained in Counts One through Fourteen at length herein.
2. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
3. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
4. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
5. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II

ANSWER TO CROSS CLAIM  
COUNT SIXTEEN

1. Defendant, Richard DiBenedetto, repeats answers contained in Counts One through Fifteen at length herein.
2. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
3. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

4. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
5. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II

ANSWER TO CROSS CLAIM  
COUNT SEVENTEEN

1. Defendant, Richard DiBenedetto, repeats answers contained in Counts One through Sixteen at length herein.
2. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
3. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
4. Neither admitted nor denied, but leave the cross-claimant to its proofs.
5. Neither admitted nor denied, but leave the cross-claimant to its proofs.
6. Neither admitted nor denied, but leave the cross-claimant to its proofs.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II

ANSWER TO CROSS CLAIM  
COUNT EIGHTEEN

1. Defendant, Richard DiBenedetto, repeats answers contained in Counts One through Seventeen at length herein.
2. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
3. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
4. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
5. Neither admitted nor denied, but leaves the cross-claimant to its proofs.
6. Neither admitted nor denied, but leaves the cross-claimant to its proofs.

WHEREFORE, defendant, Richard DiBenedetto, demands dismissal of cross-claim by National Home Funding Inc. and Robert Skowrenski, II

FIRST AFFIRMATIVE DEFENSE

Defendants, National Home Funding Inc. and Robert Skowrenski, II, have no authority or standing to bring this suit.

SECOND AFFIRMATIVE DEFENSE

The CounterClaim of the Defendants, National Home Funding Inc. and Robert Skowrenski, II, is barred, in whole or in part by the equitable doctrine of unclean hands.

THIRD AFFIRMATIVE DEFENSE

Defendant, Richard DiBenedetto, acted in good faith and did not directly or indirectly induce the act or acts complained of by the cross-claimants.

FOURTH AFFIRMATIVE DIFENSE

Defendant, Richard DiBenedetto, conduct is not the course of any inquiry or damages allegedly suffered by the cross-claimants.

FIFTH AFFIRMATIVE DEFENSE

Counterclaimants were contributory negligent, and such negligence was the proximate, efficient, and contributory cause of their damages.

WHEREFORE, defendant, Richard DiBenedetto, seeks judgement dismissing counterclaim of defendants, National Home Funding Inc. and Robert Skowrenski, II against Richard DiBenedetto and for interest, costs, attorney fees and other relief this Court deems to be just and equitable.

Dated: December 24, 1997

A handwritten signature in black ink, appearing to read 'R DiBenedetto', written in a cursive style.

Richard DiBenedetto  
Defendant  
Pro Se